

EXHIBIT B

(Part 6 of 10)

22. From the period beginning January 1990 through the present, please provide any and all NCB Islamic Banking Division and/or NCB Shariah Committee documents discussing Islamic independence movements and/or the legitimacy of armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, and Turkey.

ANSWER:

23. From the period beginning January 1990 through the present, please provide any and all NCB Islamic Banking Division and/or NCB Shariah Committee documents discussing the provision of support to mujihadeen forces in any part of the World. For purposes of this request, the term “support” includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

24. From the period beginning January 1990 through the present, please provide any and all NCB Islamic Banking Division and/or NCB Shariah Committee documents discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term “support” includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

25. From the period beginning January 1990 through the present, please provide any and all NCB Islamic Banking Division and/or NCB Shariah Committee documents governing, describing, detailing or otherwise relating to NCB's policies and procedures regarding the collection of *zakat* and *haram* monies, including the distribution of such monies to charitable or other designees.

ANSWER:

26. From the period beginning January 1990 through the present, please provide any and all NCB Islamic Banking Division and/or NCB Shariah Committee documents relating to the International Islamic Relief Organization, the Muwafaq Foundation, the Saudi Joint Relief Committee for Kosovo and Chechnya, and the Saudi Red Crescent, including but not limited to the transfer of funds to those charities.

ANSWER:

27. From the period beginning January 1990 through the present, please provide any and all documents listing or summarizing the accounts maintained by NCB for the Muwafaq Foundation, the International Islamic Relief Organization, and the Saudi Joint Relief Committee for Kosovo and Chechnya, including but not limited to, any lists or summaries which can be generated electronically.

ANSWER:

28. From the period beginning January 1990 through the present, please provide any and all documents listing or summarizing transactions carried out on behalf of, or for the benefit of, the Muwafaq Foundation, the International Islamic Relief Organization, and the Saudi Joint Relief Committee for Kosovo and Chechnya, including but not limited to, any lists or summaries which can be generated electronically.

ANSWER:

29. From the period beginning January 1990 through the present, please provide any and all documents, including documents which can be generated electronically, summarizing any contributions by NCB to the Charities, including but not limited to, monetary donations (including any monetary donations of funds originating from *haram* investments or activities), *zakat*, gifts, grants, and/or other charitable contributions. If the contribution was made by wire transfer, please provide records identifying the name of the individual who sent the money, the bank from which the money was sent, the wire transfer number, the recipient of the funds, the bank which received the wire transfer and the bank account numbers of the sender and receiver.

ANSWER:

30. From the period beginning January 1990 through the present, please provide any and all documents relating to any form of non-monetary support or contribution provided by NCB to the Charities, including but not limited to, any administrative assistance, any assistance in obtaining identification and credentials to facilitate international travel, and any physical and logistical assets.

ANSWER:

31. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, Internal Investigator, and/or any Saudi Investigator, which references or addresses any relationship between NCB and the Charities, including without limitation, any investigation relating to financial transactions between NCB and the Charities.

ANSWER:

32. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States Investigator, any Foreign Investigator, Internal Investigator, and/or any Saudi Investigator, regarding any of the Charities' accounts held at NCB.

ANSWER:

33. Please provide any and all documents relating, in whole or in part, to any audit, analysis, examination, survey, or review of the Charities' financial accounts, investments, assets, capital, and/or financial affairs, conducted either by NCB and/or NCB's Audit, Zakat or Shariah Committees, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, due diligence, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

34. From the period beginning January 1990 through the present, please provide any and all documents relating to any investigation, inquiry, audit, due diligence or analysis conducted by the Saudi Arabian Ministry of Interior (including but not limited to the General Investigations Directorate and the Mabahith), relating in any way to NCB.

ANSWER:

35. From the period beginning January 1990 through the present, please provide any and all documents relating to any investigation, inquiry, audit, due diligence or analysis

conducted by the Saudi Arabian Ministry of Interior (including but not limited to the General Investigations Directorate and the Mabahith), relating in any way to Khalid bin Mahfouz or the bin Mahfouz family, including without limitation, any alleged improprieties relating to the transfer of NCB funds and/or personal funds by any member of the Bin Mahfouz family.

ANSWER:

36. Please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and Yassin al Kadi, including without limitation, any and all documents relating to all positions Yassin al Kadi held or holds within NCB.

ANSWER:

37. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's role in the organization, funding, oversight, supervision, management, and/or control over NCB's operations, including without limitation, selection of committee/board members or other officers, establishment and maintenance of correspondent banking relationships, internal and external auditing or due diligence, budgeting, credit and loan activities, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, and actual distribution of NCB financial and non-monetary support to charitable designees.

ANSWER:

38. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's role in the oversight, supervision, management, and/or control over NCB's various committees, including without limitation, NCB's Zakat, Audit and Shariah Committees.

ANSWER:

39. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's supervision, management, control of, or distribution of NCB's funds, including without limitation, any and all documents relating to his duties and responsibilities to determine and/or make recommendations as to which charities, individuals, or entities should receive financial and/or non-monetary support from NCB and the purpose for such disbursements.

ANSWER:

40. From the period beginning January 1990 through the present, please provide any and all documents relating, in whole or in part, to Yassin al Kadi's involvement in the distribution of any funds through NCB to the Muwafaq Foundation, the International Islamic Relief Organization or the Saudi Joint Relief Committee for Kosovo and Chechnya.

ANSWER:

41. From the period beginning January 1990 through the present, please provide any and all documents regarding the transfer of funds from any account in which Yassin al Kadi held a direct or beneficial interest, or over which he held signatory authority, to the Muwafaq Foundation, the International Islamic Relief Organization or the Saudi Joint Relief Committee for Kosovo and Chechnya.

ANSWER:

42. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's involvement in determining and/or recommending which charities, humanitarian organizations, or dawah organizations should receive financial and/or non-monetary support from NCB and the purpose for such disbursements.

ANSWER:

43. From the period beginning January 1990 through the present, please provide any and all documents relating to Yassin al Kadi's role in establishing and implementing an Islamic banking division within NCB, including without limitation, all documents relating to Yassin al Kadi's role in developing Islamic banking products for NCB, and the design and implementation of training programs for NCB.

ANSWER:

44. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and the National Management Consultancy Center ("NMCC").

ANSWER:

45. Please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and the Kingdom of Saudi Arabia.

ANSWER:

46. From the period beginning January 1990 through the present, please provide any and all documents relating to the KSA's role in the organization, funding, oversight, supervision, management, and/or control over NCB's operations, including without limitation, selection of committee/board members or other officers, establishment and maintenance of correspondent banking relationships, internal and external auditing or due diligence, budgeting, credit and loan activities, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, and actual distribution of NCB financial and non-monetary support to charitable designees.

ANSWER:

47. From the period beginning January 1990 through the present, please provide any and all documents relating to the KSA's role in the oversight, supervision, management, and/or

control over NCB's various committees, including without limitation, NCB's Zakat, Audit and Shariah Committees.

ANSWER:

48. From the period beginning January 1990 through the present, please provide any and all documents relating to the KSA's supervision, management, control of, or distribution of NCB's funds, including without limitation, any and all documents relating to the KSA's duties and responsibilities to determine and/or make recommendations as to which charities, individuals, or entities should receive financial and/or non-monetary support from NCB and the purpose for such disbursements.

ANSWER:

49. From the period beginning January 1990 through the present, please provide any and all documents relating to any contributions of capital to NCB by the KSA.

ANSWER:

50. From the period beginning January 1998 through 2000, please provide any and all documents relating to any repayment of loans extending to the KSA or Saudi Royal Family by NCB.

ANSWER:

51. From the period beginning January 1990 through the present, please provide any and all documents relating to the KSA's purchase of a controlling equity interest in NCB, including without limitation, any and all documents detailing the sale of the bin Mahfouz family's ownership interest in NCB to the KSA.

ANSWER:

52. From the period beginning January 1990 through the present, please provide any and all documents relating to the creation of NCB's new Chief Executive Officer (CEO) position on or around January 1, 2006, and/or any steps taken in conjunction with the application of principles of corporate governance to separate the ownership of NCB and the management of NCB.

ANSWER:

53. Please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between NCB and Abdul Rahman bin Mahfouz, including without limitation, any and all documents relating to all positions Abdul Rahman bin Mahfouz held or holds within NCB.

ANSWER:

54. From the period beginning January 1990 through the present, please provide any and all documents relating to Abdul Rahman bin Mahfouz's role in the organization, funding,

oversight, supervision, management, and/or control over NCB's operations, including without limitation, selection of committee/board members or other officers, establishment and maintenance of correspondent banking relationships, internal and external auditing or due diligence, budgeting, credit and loan activities, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, and actual distribution of NCB financial and non-monetary support to charitable designees.

ANSWER:

55. From the period beginning January 1990 through the present, please provide any and all documents relating to Abdul Rahman bin Mahfouz's role in the oversight, supervision, management, and/or control over NCB's various committees, including without limitation, NCB's Zakat, Audit and Shariah Committees.

ANSWER:

56. From the period beginning January 1990 through the present, please provide any and all documents relating, in whole or in part, to Abdul Rahman bin Mahfouz's involvement in the distribution of any funds through NCB to the Muwafaq Foundation, the International Islamic Relief Organization or the Saudi Joint Relief Committee for Kosovo and Chechnya.

ANSWER:

57. From the period beginning January 1990 through the present, please provide any and all documents regarding the transfer of funds from any account in which Abdul Rahman bin Mahfouz held a direct or beneficial interest, or over which he held signatory authority, to the Muwafaq Foundation, the International Islamic Relief Organization or the Saudi Joint Relief Committee for Kosovo and Chechnya.

ANSWER:

58. From the period beginning January 1990 through the present, please provide any and all documents relating to Abdul Rahman bin Mahfouz's involvement in determining and/or recommending which charities, humanitarian organizations, or dawah organizations should receive financial and/or non-monetary support from NCB and the purpose for such disbursements.

ANSWER:

59. Please provide all documents relating to any and all information or notification You received that the NCB al Tahlia street branch (Branch No. 123), including any individual or entity employed by and/or affiliated with that branch office, was facilitating the transfer of funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

60. Please provide all documents relating to any and all information or notification You a received that the NCB al Tahlia street branch (Branch No. 123), including any individual or entity employed by and/or affiliated with that branch office, was associated with or involved in: (i) providing funds, services, assets, medical assistance or any other form of support to mujihadeen in any part of the World; or (ii) providing financial, logistical, religious, political or any other form of assistance in relation to any armed jihad, regardless of whether such jihad was declared legitimate by competent religious authorities.

ANSWER:

61. Please provide any and all documents relating to any audit, analysis, examination, survey, or review of the financial activities of the NCB al Tahlia street branch (Branch No. 123), conducted either by NCB and/or NCB's Audit, Zakat or Shariah Committees, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

62. From the period beginning January 1990 through the present, please provide all documents relating to any investigation, inquiry, review, audit, or analysis conducted by any

United States Investigator, any Foreign Investigator, and/or any Saudi Investigator, which references or addresses any alleged improprieties relating to the transfer of funds from any NCB account through NCB's al Tahlia street branch (Branch No. 123).

ANSWER:

Respectfully submitted,

COZEN O'CONNOR

Dated: August 8, 2008

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the *Federal Insurance* Plaintiffs' Second Set of Jurisdictional Requests for Production of Documents Directed to the National Commercial Bank were served via electronic mail and U.S. first-class mail, postage prepaid, this 8th day of August 2008, upon:

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(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)



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